

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DALE STRAWN,

Plaintiff,

v.

HAL NEDERLAND N.V., a Curacao  
corporation; HOLLAND AMERICA LINE  
N.V., a Curacao Corporation; HOLLAND  
AMERICA LINE, INC., a Washington  
corporation; HOLLAND AMERICA LINE-  
USA, INC., a Delaware corporation; STEINER  
MANAGEMENT SERVICES, LLC a Florida  
Limited Liability Company; STEINER  
TRANSOCEAN, LTD., a Bahama Corporation;  
STEINER TRANSOCEAN, U.S., INC., a  
Florida Company; and UNKNOWN  
DEFENDANTS 1-4.,

Defendants.

No. 2:16-cv-00214-JLR

**JOINT STIPULATION AND REQUEST  
TO EXTEND DISCOVERY DEADLINE  
AND ~~[PROPOSED]~~ ORDER**

**NOTE ON MOTION CALENDAR:  
June 30, 2017**

**MOTION**

COME NOW Defendants HAL Nederland N.V., Holland America Line N.V., Holland  
America Line, Inc., Holland America Line-USA, Inc., Steiner Management Services, LLC,

JOINT STIPULATION AND REQUEST TO EXTEND  
DISCOVERY DEADLINE AND ~~[PROPOSED]~~ ORDER  
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**NIELSEN \* SHIELDS**

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Steiner Transocean, Ltd. and Steiner Transocean, U.S., Inc. and Plaintiff Dale Strawn, by and through their respective counsel, and file this Joint Stipulation and Request to Extend the Discovery Deadline to allow for the taking of two depositions after the current discovery deadline of July 10, 2017.

The Parties respectfully request to extend pre-trial deadlines to allow an additional three weeks to accommodate the schedules of two witnesses, Mark Barnard and Frank Smith. Despite the efforts of counsel, the parties have not been able to set dates before the upcoming deadline. Mediation is set for July 14 and the parties anticipate being able to complete these depositions with two weeks of the mediation date should the claim not resolve. The proposed extension will not affect any other scheduled dates and trial is still set to begin on November 6, 2017. As such, the Parties respectfully request the court to extend the discovery deadline until July 28, 2017 to allow these depositions to take place.

#### STIPULATION

The parties hereby stipulate to a continuance of the <sup>discovery</sup> ~~pre-trial~~ deadline from July 10, 2017 to July 28, 2017.

DATED this 30th day of June, 2017.

s/Louis A. Shields

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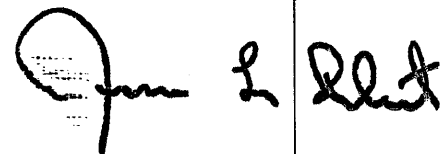
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Attorneys for Plaintiff

**PROPOSED ORDER**

It is so ordered.

DATED this 5<sup>th</sup> day of July, 2017.



THE HONORABLE JAMES L. ROBART  
UNITED STATES DISTRICT JUDGE  
WESTERN DISTRICT OF WASHINGTON

Presented by:

NIELSEN SHIELDS, PLLC

By: s/ Louis A. Shields

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Signed at Seattle, Washington.

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